

GLOBAL NAPS, INC.

COMMONWEALTH OF MASSACHUSETTS

DOCKET NO. 03-29

Respondent: Paul Parks, Jr.

Title: Director of Real Estate

REQUEST:	Department of Telecommunications and Energy, First Set of Information Requests to Global NAPS, Inc.
DATED:	April 1, 2003
DTE-GN-1	Please explain the financial burden to initiate and administer a drug testing program that Global NAPS asserts is required by Verizon's new policy.
RESPONSE:	There are a number of financial burdens to Global NAPS in connection with the administration of a drug testing policy. These burdens include, but are not limited to Global having to arrange, coordinate and hire a testing facility to establish such a program, Global would have to assign personnel to be responsible for administering the program internally and scheduling the tests and reporting the results to Verizon.

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DTE-GN-2 Is using an external company to conduct drug testing a feasible
option for Global NAPS? Why or why not?

RESPONSE: If the Department were to uphold Verizon's drug testing
requirement, Global NAPS would attempt to outsource as much of
the program as possible. Notwithstanding such outsourcing,
internal coordination would be required between our technicians
and management.

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DTE-GN-3 Given that Verizon sent notice of changes to its collocation identification and access card application requirements in July, 2002, please explain why Global NAPS waited until December, 2002 to raise objections to the requirements.

RESPONSE: Global NAPS had been attempting to have employee badges renewed prior to December, 2002. The applications had been returned due to failure to comply with the *new* procedures at which time, Global's counsel brought this to Verizon's attention. In fact, it was not until after Global filed its complaint that it discovered that Verizon's policy is to not require drug testing or background checks for renewal of identification badges, but only for issuance badges to (1) new employees or (2) employees whose badges have expired.

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DTE-GN-4 Please explain why Global NAPS does not conduct criminal
background checks on its employees.

RESPONSE: Despite its rapid growth and expansion throughout the country,
Global is still very much a small company. Most of Global's
employees are recruited through internal referrals and word-of-
mouth from trusted sources. Many of Global's employees have
experience in our armed forces and have already undergone
rigorous background checks. Due to personal knowledge of the
prospective employee and/or their employment histories, Global
believes that duplication of such investigation is unnecessary,
duplicative and inefficient.

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DTE-GN-5 Please explain what information was requested under Verizon's previous collocation identification and access card application requirements. Did Global NAPS provide all the information that was requested? If not, what information was omitted and why?

RESPONSE: The "old" applications required the applicant to provide their social security number, date and place of birth. The application also required the employees' supervisor's name and telephone number. Global NAPS provided this information.

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DTE-GN-6 Has Global NAPS ever provided its employees' social security numbers, or dates or places of birth to Verizon in order to obtain collocation identification and access cards? If so, why is this request now unreasonable?

RESPONSE: It is Global's position that it has always been unreasonable to require Global's employees to provide their social security numbers, due to the privacy concerns and the potential that this information could be used for improper purposes. However, Global has provided this information since it had no other choice in order to have the badges issued. Now that Global is bringing these issues before the Department, it is asking to have this requirement eliminated in order to spare the potential for abuse that such information may provide.

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Respondent: John O. Postl
Title: Assistant General Counsel

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DTE-GN-7 Please identify which of Verizon's new application requirements
violate the Massachusetts Civil Rights Act. Include an explanation
how such requirements violate the act.

RESPONSE: Global NAPS objects to this information request to the extent that
it calls for legal conclusion and/or analysis.